1 The Honorable Tana Lin 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE ALEXANDER TABER. 10 Plaintiff. No. 2:20-cy-01633-TL 11 STIPULATED MOTION AND v. (PROPOSED) ORDER FOR 12 EXTENDING DISCOVERY CASCADE DESIGNS, INCORPORATED, DAVID BURROUGHS, JOHN BURROUGHS, DEADLINE TO CONDUCT 13 JOHN GEVAERT, JAMES COTTER, ERIC PLAINTIFF'S DEPOSITION HOBBS, STEVE McLURE, HARRY ROSS, 14 JANE/JOHN DOES 1 THROUGH 10, and the Noting Date: April 3, 2023 marital community of each non-business 15 Defendant, CASCASE DESIGNS, INC. OPEN [Clerk's Action Required] ACCESS PLUS IN-NETWORK MEDICAL 16 BENEFITS, CASCADE DESIGNS, INC. WELFARE BENEFITS PLAN, 17 Defendants. 18 19 Pursuant to Federal Rule of Civil Procedure 29(b), LCR 16(e)(6), and Judge Lin's Standing Order for All Civil Cases, Defendants Cascade Designs, Incorporated, et al. ("Cascade") and 20 Plaintiff Alexander Taber, by and through undersigned counsel, hereby stipulate and request this 21 22 Court approve an extension of the time set to complete discovery *solely* for purposes of conducting Plaintiff's deposition until May 5, 2023. On August 8, 2022, this Court entered an order setting 23 24 trial and related dates, which provides in relevant part that all discovery should be completed by 25 April 17, 2023. ECF 125. On March 29, 2023, Cascade noted Plaintiff's deposition; however, Plaintiff is not available until after the time set to complete discovery. For this reason, the Parties 26 27 have stipulated and believe good cause exists for this Court to extend the time set for discovery

solely for purposes of taking Plaintiff's deposition until May 5, 2023. SUBMITTED April 3, 2023. 2 3 THE BARTON LAW FIRM DAVIS WRIGHT TREMAINE LLP Attorney for Plaintiff Attorneys for Defendants 4 Signature added per email authority on April 1, 2023: 5 By /s/John G. Barton By <u>/s/ Scott Prange</u> John G. Barton, WSBA #25323 Harry J. F. Korrell, WSBA #23173 6 1567 Highlands Dr. NE, Suite 110-34 Scott Prange, WSBA #53980 7 Issaquah, WA 98029-6245 Nicholas Wegley, WSBA #55752 Telephone: 425.243.7960 920 Fifth Avenue, Suite 3000 8 Email: TheBartonLawFirm@gmail.com Seattle, WA 98104-1610 Telephone: 206.622.3150 9 Email: harrykorrell@dwt.com Email: scottprange@dwt.com 10 Email: nickwegley@dwt.com 11 12 13 14 **ORDER** 15 The Court finds that good cause exists for this Court to extend the time set for discovery 16 solely for purposes of taking Plaintiff's deposition until May 5, 2023. 17 It is so ordered. 18 Dated this 3rd day of April 2023. 19 Vara S. 20 Tana Lin 21 United States District Judge 22 23 24 25 26 27